

State Opioid Response (SOR) Procedural Statement: Gift Card Incentives

Introduction

This procedural statement sets forth requirements for the authorization of gift card incentives.

Procedural Statement

Gift cards are cash-like instruments used in lieu of cash or check. Since gift cards are cash equivalents, it is important that agencies and service providers handle and account for them appropriately. The purpose of these procedures is to set forth the requirements for use, approval, purchase, accounting, reporting, and safeguarding of gift cards.

THE PROCEDURAL STATEMENT IS DIVIDED INTO THE FOLLOWING SECTIONS:

- Allowable Use
- Prohibitions
- Internal Controls
 - Custody
 - Numbering and Security
 - Distribution Procedures and Audit Logs
 - Record Retention
- Lost Cards
- Reconciliation
- Procurement

Allowable Use

CSAT funding (i.e. State Opioid Response Grant) may be used for incentives to encourage and reward the completion of certain types of Government Performance and Results Act (GPRA) interviews, with a maximum non-cash value of \$30 per interview.

Gift Card Incentives are permitted for the following:

- A GPRA follow-up interview
- A GPRA discharge interview where staff contact a client to complete a discharge interview who has either left or dropped out of a program. A gift card incentive cannot be used for “routine discharge interviews”

Types of Gift Cards* that are permissible:

- Department Stores (*ex. Walmart, Target, etc.*)
- Restaurants (*non-alcohol serving*) (*ex. Hoss’s Family Steak and Sea House, Cracker Barrel, etc.*)
- Transportation and Gas Cards (*ex. Metro, Bus Pass, Uber, Exxon, Sunoco, etc.*)
- Grocery Stores (*ex. Giant, Weis Market, Food Lion, etc.*)
- Movie Passes (*ex. Regal Cinemas, AMC, Fandango, etc.*)
- Prepaid Phone Cards
- Amazon Gift Cards

** If a service provider has another idea or recommendation for an incentive that they wish DDAP to consider, a request can be made to DDAP for consideration.*

Prohibitions

Gift cards:

- shall not allow for the potential of a recipient to purchase alcoholic drinks or beverages.
- cannot be used for “routine discharge interviews.”
- may not exceed a cash value of \$30.

No more than 2 types of gift cards may be purchased and utilized by a service provider as an incentive at one time.

No more than \$1,500 in gift cards may be purchased and maintained at any given time.

Internal Controls

Internal controls over gift cards are required at all times.

Each service provider must have procedures in place that provide for the proper safeguarding of gift cards. At a minimum, the following internal controls must be in place and followed:

a. ***Custody***

A single individual, preferably a fiscal or financial officer, must be the designated custodian of the gift cards. This individual will be responsible for ensuring all purchasing, security, dispensing, tracking, and replenishing procedures are followed.

If custody needs to be transferred temporarily (or permanently) from the designated custodian to another departmental personnel, a receipt acknowledging the transfer of responsibility must be prepared, signed, and dated by both parties stating the recipient agrees to be held accountable for the safeguarding and dispensing of the gift cards. Each party to the agreement should receive a copy of the agreement, and a copy should be kept with the inventory. This process will ensure responsibility rests with a single individual at any point in time.

b. ***Numbering and Security***

All gift cards must be numbered and secured at all times (e.g. in a locked box inside a locked cabinet or drawer). The custodian must number each gift card with a fine-point, permanent marker along with the card dollar amount if not already notated and store them inside the lock box compartment. He/she will have the primary set of keys; a second person should have a duplicate key for the box, and a third person should have a duplicate key for the drawer/cabinet, so that two people are required to unlock the box when the custodian is absent.

c. ***Disbursement Procedures and Audit Logs***

Maintenance Log (Attachment A) – Completed by Custodian

The custodian must keep an audit log of gift card purchases and disbursements for audit purposes. This log will be used to audit the accuracy and adequacy of the gift card recordkeeping. This is particularly critical in demonstrating the gift cards are allocable to the State Opioid Response (SOR) grant. Information maintained on this log includes:

- Type/Name of Gift Card(s)
- Starting Quantity
- Dollar Amount of Card(s)
- Name of Case Manager / Staff Requesting Card(s)
- Number of Cards Requested
- Ending Card Balance(s)

(This log must be stored and kept with the gift cards inside the locked box.)

Request Form (Attachment B) - Completed by Case Manager or provider completing GPRA interviews

When gift cards are needed by case managers/staff for completion of certain GPRA interviews, the requestor will complete a Request Form (Attachment B) and give to the individual designated as the custodian.

- This request for gift cards should be given 2-weeks in advance to provide ample time for the custodian to fulfill the request.
- A maximum of 10 gift cards may be requested at one time.

Once received the custodian will make any necessary purchase, prepare the gift cards, and update the Gift Card Maintenance Log (Attachment A).

The custodian will then hand-deliver the requestor with the number of cards he/she requested. Both shall *sign* and *date* the Request Form (Attachment B) acknowledging the delivery and transfer of cards.

The custodian shall maintain and file all completed Request Forms.

Each requestor is responsible for the safe keeping of gift cards provided to them and must be kept in a secure location.

Receipts Log (Attachment C) – Completed by Case Manager or provider and Initialed by Client

This log will be used to document gift card issuance to the clients once a qualified GPRA interview has been completed and a card is awarded. Information recorded includes:

- The Type of Gift Card
- Gift Card Number assigned by custodian
- Date Given
- GPRA-generated Client ID Number - this is the ID number assigned by the GPRA reporting system to identify the individual in order to protect their confidentiality
- Initials of the client recipient.

Once all gift cards are given out, the requestor (i.e. case manager) shall give the completed Receipts Log (Attachment C) to the custodian. Custodian will file the Receipts Log (Attachment C) with the requestor's Request Form(s) (Attachment B).

If more cards are needed, the requestor must repeat the process.

d. Record Retention

All records related to gift cards, including audit logs, receipts, temporary custody agreements, and inventory reconciliations signed by the supervisor shall be kept in accordance with the Commonwealth's Record Retention Policy.

Lost cards

The value of receipts and gift cards must total the authorized amount purchased and approved by the custodian and Finance Office. Agency employees are held responsible for any gift cards in their possession

that are lost or misplaced. Any shortage must be reported immediately to the Finance Office and local police department.

Reconciliation

A reconciliation of the gift cards should be conducted every time gift cards are purchased or on at least a monthly basis. This reconciliation should consist of verifying that the number of cards purchased minus the number of cards disbursed agree to the number of cards on hand. In addition, the value of the cards purchased should agree to the amount recorded on the Maintenance Log (Attachment A). Also, a quarterly reconciliation shall be observed by the custodian's supervisor and documented by a signed statement.

Procurement

Gift cards may be purchased using State Opioid Response (SOR) funding.

Gift Card Request Form

Date of Request _____

Name of Requestor _____

Quantity	Card Amount	Type of Card	Number(s)

(Note: No more than 10 cards may be requested at any given time.)

(Sign and date when request is completed)

Requestor's Signature _____ Date _____

Card Custodian's Signature _____ Date _____

(Completed Request Forms must be filed by Custodian)

